

IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRTIETH
JUDICIAL DISTRICT AT MEMPHIS

JOANNA KILLEBREW,

Plaintiff,

Vs.

JOEY HYLANDER,
SPHERION STAFFING, or SPHERION,
MENLO WORLDWIDE LOGISTICS,

Defendants,

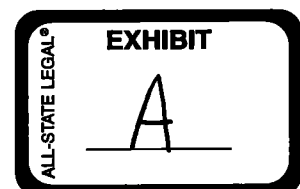
No. QT-604758-11 VI
Division
-JURY DEMANDED-

FILED
OCT 19 2011
CIRCUIT COURT CLERK
BY [Signature] D.C.

COMPLAINT FOR UNLAWFUL DISCRIMINATION IN EMPLOYMENT

For her Complaint in this action the Plaintiff, Joanna Killebrew, hereby states:

1. That she is a resident citizen of Shelby County, Tennessee. That the Defendant, Joey Hylander, is a resident citizen of Shelby County, Tennessee.
2. That the Defendants, Spherion or Spherion Staffing, and Menlo Worldwide Logistics, are businesses and entities that are now and have been doing business within Shelby County, Tennessee and they also have business offices that are located within Shelby County, Tennessee.
3. That the Plaintiff, Joanna Killebrew, was a full-time employee with and through the Defendants for the period from August of 2006 until October 21, 2010. That the Plaintiff was terminated as an employee of Defendants on October 21,



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2010 from unlawful employment practices and actions that were practiced against the Plaintiff by the Defendants within Shelby County, Tennessee.

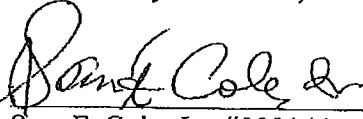
4. That the Defendant, Joey Hylander, was a supervisor or in a management position over the Plaintiff during her period of employment in Shelby County, Tennessee. That in the year 2010 the Plaintiff was pregnant and had a child born to her after being an employee with or under the Defendants.
5. That she was discharged on October 21, 2010 as an employee from her over four year period of employment as a result of unlawful employment actions and practices taken against her in violation of the law of the State of Tennessee.
6. That the excuses, or reasons given, or advanced, by the Defendants for terminating the Plaintiff from her employment were completely false and pre-textual.
7. That discriminatory, retaliatory and harassing actions and practices that were taken against the Plaintiff by the Defendants during her employment were based upon her sex, her race, and her pregnancy. Those actions and practices on the part of the Defendants violated Tennessee statutes T.C.A. § 4-21-101, et. seq., T.C.A. § 4-21-301, T.C.A. § 4-21-401, T.C.A. § 4-21-408, and T.C.A. § 4-21-701.
8. That she has suffered and sustained damages, humiliation and embarrassment, loss of salary or income, and loss of employment benefits as a result of the Plaintiff's unlawful and discriminatory termination from her employment with the Defendants.

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WHEREFORE, Plaintiff demands judgment against the Defendants for money damages up to \$60,000.00, attorney fees and costs, plus all other general or additional relief that she may be entitled to receive in this action.

A TRIAL BY JURY IS DEMANDED.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Sam F. Cole, Jr.", is written over a horizontal line.

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